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June 10, 2024

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VIA CM/ECF AND EMAIL

Honorable Andrew L. Carter, Jr.
United States District Court Judge
Southern District of New York
40 Foley Square, Room 435
New York, New York 10007
ALCarterNYSDChambers@nysd.uscourts.gov

Re: *Gina Marin v. 310 Bowery Group, LLC, d/b/a 310 Bowery Bar and Epstein's Bar, LLC*
d/b/a 82 Stanton Bar, and Richard Aurigemma
Civil Action No.: 1:24-cv-01340-(ALC)

Dear Judge Carter:

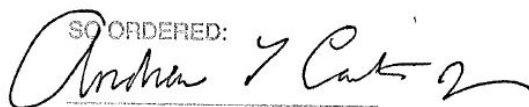
This firm represents Defendants 310 Bowery Group, LLC d/b/a 310 Bowery Bar, Epstein's Bar, LLC d/b/a 82 Stanton Bar, and Richard Aurigemma (collectively "Defendants") in the above-referenced action. We write with Plaintiff's consent to request an adjournment of the pre-motion conference in above-referenced action initiated by Plaintiff Gina Marin ("Plaintiff") and an extension of time to respond to Plaintiff's letter motion.

Currently, there is a pre-motion conference scheduled for June 18, 2024. The undersigned, who is lead counsel, will be out of the country on a pre-scheduled vacation. As such, Defendants respectfully request that the pre-motion conference be adjourned to a date after June 26, 2024 that is convenient for the Court. Plaintiff consents to this request. This is Defendants' first request for an adjournment of the conference.

Additionally, as the Court knows, Defendants' time to respond to Plaintiff's May 29, 2024 letter motion was extended to June 11, 2024. However, Defendants respectfully request that their time to respond be extended until June 14, 2024. Defendants request this extension to further evaluate and subsequently discuss with Plaintiff's counsel a potential stipulation regarding collective certification. This is Defendants' second request, which Plaintiff consents to.

We thank Your Honor for the Court's attention to this matter.

Very truly yours,
Kaufman Dolowich, LLP

SO ORDERED:

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE


Aaron N. Solomon

New York, NY
June 12, 2024